



FRED WILLIAMSON & ASSOCIATES, INC.
Telecommunications Management Services

VIA ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of Secretary
445 12th Street, S. W.
Washington, D.C. 20554

July 1st, 2017

RE: Submission of information Pursuant to FCC 54.313 Rules and Request
for Confidential Treatment – ETC Annual Reports and Certifications WC
Docket Nos. 10-90 and 14-58

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, **PIONEER TELEPHONE ASSOCIATION, INC. or "Pioneer"** (Study Area Code **411817**), is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket Nos. 10-90 and 14-58. Pioneer by its authorized representative, hereby requests confidential treatment of one attachments to its FCC Form 481: the Consolidated Financial Statements identified on Line 3005, which was redacted in the ECFS submission.

The request for confidential treatment of the financial annual report is being made pursuant to the FCC's March 22, 2016 Protective Order in WC Docket Nos. 10-90 and 14-58. The financial reports contain competitively sensitive data that is not otherwise available from publically available sources.

The request for confidential treatment is being made pursuant to section 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act (FOIA).

Pioneer keeps this information strictly confidential and it is subject to protection under the Freedom of Information Act (FOIA) and the Commission's implementing rules. Release of this information would have a substantial negative impact on the Company.

Pioneer is also transmitting the following information to the Commission in compliance with C.F.R. §§54.313 and 54.422:

- Submission to the Office of the Secretary, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection. Confidential information has been designated in accordance with Confidentiality guidelines and the Protective Order.

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as an attachment to the FCC Form 481.

121 East College Street • Broken Arrow, OK 74012 • 918-298-1618

REDACTED - FOR PUBLIC INSPECTION

Pioneer requests that the information contained in its annual financial report be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Company keeps confidential. Public availability of this information would have a substantial negative impact on the Company.

Pioneer offers the following information pursuant to section 0.459 of the Commission's rules and Exemption 4 of FOIA in support of this request:

(1) Identification of the specific information for which confidential treatment is sought:

Attachment to Line 3005 of FCC Form 481 – Consolidated Financial Statements. Specifically, confidential treatment is sought for all information in the report.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The information was submitted in WC Docket Nos. 10-90 and 14-58 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form.

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The Consolidated Financial Statements contains financial information and subscriber counts for a privately held company, which is not made publicly available.

(4) Explanation of the degree to which the information concerns a service that is subject to competition:

Broadband is subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more Internet service providers.

(5) Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure of the information contained in the financial report would provide competitors with detailed information regarding the Company's financial position. This would provide competitors access to confidential information they could employ to develop their own plans in a particular service area. This could cause competitive harm to the Company.

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The Company has continually treated financial information as confidential and carefully controls the information to protect it from competitors.

(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The redacted information in the Consolidated Financial Statements are not available to the public, and third party access is limited as described in (6) above.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

The Company requests that the extracted information be withheld from public inspection indefinitely. The information and financial details would provide valuable information to competitors for several years beyond that period.

(9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

Please contact me if you have any questions.

Sincerely,

Tim Morrissey

President,
FWA, Inc.

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**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Catherine Moyer
<035>	Contact Telephone Number: Number of the person identified in data line <030>	6203563211 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	catherine.moyer@pioncomm.net
	Form Type	54.313 and 54.422

<010>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2018
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<210> For the prior calendar year, were there any reportable voice service outages? No

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**(300) Unfulfilled Service Request
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

<300> Unfulfilled service request (voice)

0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

0

<330> Detail on attempts (broadband)

Name of Attached Document

<010>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

<010>	Study Area Code	411817
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<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
411817KS510 .pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

(600) Functionality in Emergency Situations		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	411817KS610.pdf

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<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

<701>	Residential Local Service Charge Effective Date	1/1/2017
<702>	Single State-wide Residential Local Service Charge	18.5

[illegible]

<010>	Study Area Code	411817
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-- See attached worksheet --

**(800) Operating Companies
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net
<810>	Reporting Carrier	Pioneer Telephone Association, Inc.
<811>	Holding Company	Pioneer Telephone Association, Inc.
<812>	Operating Company	Pioneer Telephone Association, Inc.

[illegible]

**(900) Tribal Lands Reporting
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 411817KS1010.pdf

Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance 411817KS1030.pdf

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP www.pioncomm.net/phone/

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- | | |
|--|-------------------------------------|
| <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> Details on the number of minutes provided as part of the plan, | <input checked="" type="checkbox"/> |
| <1223> Additional charges for toll calls, and rates for each such plan. | <input checked="" type="checkbox"/> |

(2005) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

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Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2011> 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.
- <2022> Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.
- <2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.
- <2024A> Round 2 Recipient of Incremental Support?
- <2024B> Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.
- <2025A> Round 2 Recipient of Incremental Support?
- <2025B> Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).
- <2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

Name of Attached Document Listing
Required Information

Name of Attached Document Listing
Required Information

(2005) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

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Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
Yes - Attach Certification			
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}		411817KS3010b.pdf
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input type="radio"/> <input checked="" type="radio"/>
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input checked="" type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.		<input checked="" type="checkbox"/>
If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	411817KS3026.pdf

(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

**REDACTED - FOR PUBLIC INSPECTION**

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4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Name of Attached Document Listing Required Information

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.

Name of Attached Document Listing Required Information

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.

Name of Attached Document Listing Required Information

**Certification - Reporting Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

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TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: PIONEER TEL ASSN INC	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/26/2017
Printed name of Authorized Officer: Catherine Moyer	
Title or position of Authorized Officer: CEO/General Manager	
Telephone number of Authorized Officer: 6203563211 ext.	
Study Area Code of Reporting Carrier: 411817	Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier
Data Collection Form**

 FCC Form 481
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TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent Firm:	
Signature of Authorized Agent or Employee of Agent:	Date:
Name of Authorized Agent Employee:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

(700) Price Offerings including Voice Rate Data Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

OMB Control No. 3060-0986/OMB Control No. 3060-0819

OMB Control No. 3060-0986/OMB Control No. 3060-0819

[illegible]

**(710) Broadband Price Offerings
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
	KS	All Exchanges	39.95	0.0	39.95	10.0	1.0	0.0	Other, Other, DSL - "Value" (ADSL)
	KS	All Exchanges	59.95	0.0	59.95	10.0	1.0	0.0	Other, Other, DSL - "Value" (ADSL) - Data Only
	KS	All Exchanges	69.99	0.0	69.99	20.0	1.0	0.0	Other, Other, DSL - "Basic" (Bonded DSL)
	KS	All Exchanges	79.99	0.0	79.99	20.0	1.0	0.0	Other, Other, DSL - "Basic" (Bonded DSL) - Data Only
	KS	All Exchanges	79.99	0.0	79.99	30.0	5.0	0.0	Other, Other, DSL - "Essential" (VDSL)
	KS	All Exchanges	89.99	0.0	89.99	30.0	5.0	0.0	Other, Other, DSL - "Essential" (VDSL) - Data Only
	KS	All Exchanges	89.99	0.0	89.99	50.0	10.0	0.0	Other, Other, DSL - "Enhanced" (VDSL)
	KS	All Exchanges	99.99	0.0	99.99	50.0	10.0	0.0	Other, Other, DSL - "Enhanced" (VDSL) - Data Only
	KS	All Exchanges	199.99	0.0	199.99	80.0	20.0	0.0	Other, Other, DSL - "Premium" (VDSL)
	KS	All Exchanges	209.99	0.0	209.99	80.0	20.0	0.0	Other, Other, DSL - "Premium" (VDSL) - Data Only
	KS	Ulysses	39.95	0.0	39.95	10.0	1.0	0.0	Other, Other, FTTP "Value" - Asynchronous
	KS	Ulysses	49.95	0.0	49.95	10.0	1.0	0.0	Other, Other, FTTP "Value" - Asynchronous - Data Only
	KS	Ulysses	69.99	0.0	69.99	25.0	5.0	0.0	Other, Other, FTTP "Basic" - Asynchronous
	KS	Ulysses	79.99	0.0	79.99	25.0	5.0	0.0	Other, Other, FTTP "Basic" - Asynchronous - Data Only
	KS	Ulysses	89.99	0.0	89.99	50.0	10.0	0.0	Other, Other, FTTP "Enhanced" - Asynchronous
	KS	Ulysses	99.99	0.0	99.99	50.0	10.0	0.0	Other, Other, FTTP "Enhanced" - Asynchronous - Data Only
	KS	Ulysses	99.99	0.0	99.99	25.0	25.0	0.0	Other, Other, FTTP "Business Basic" - Synchronous
	KS	Ulysses	109.99	0.0	109.99	25.0	25.0	0.0	Other, Other, FTTP "Business Basic" - Synch-Data Only
	KS	Ulysses	199.99	0.0	199.99	50.0	50.0	0.0	Other, Other, FTTP "Business Enhanced" - Synchronous
	KS	Ulysses	209.99	0.0	209.99	50.0	50.0	0.0	Other, Other, FTTP "Business Enhanced" - Synch-Data Only
	KS	Hugoton	39.95	0.0	39.95	10.0	1.0	0.0	Other, Other, FTTP "Value" - Asynchronous

(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<015>	Study Area Name	PIONEER TEL ASSN INC
-------	-----------------	----------------------

<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
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<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.
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						Total Rates	Broadband Service	Broadband Service	Usage Allowance	Usage Allowance
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KS	Hugoton	49.95	0.0	49.95	10.0	1.0	0.0	Other, Other, FTTP "Value" - Asynchronous - Data Only
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KS	Hugoton	79.99	0.0	79.99	25.0	5.0	0.0	Other, Other, FTTP "Basic" - Asynchronous - Data Only
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KS	Hugoton	89.99	0.0	89.99	50.0	10.0	0.0	Other, Other, FTTP "Enhanced" - Asynchronous
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KS	Hugoton	99.99	0.0	99.99	50.0	10.0	0.0	Other, Other, FTTP "Enhanced" - Asynchronous - Data Only
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KS	Hugoton	99.99	0.0	99.99	25.0	25.0	0.0	Other, Other, FTTP "Business Basic" - Synchronous
	Hugoton							Other, Other, FTTP "Business Basic" - Asynchronous

KS	Hugoton	109.99	0.0	109.99	25.0	25.0	0.0	Other, Other, FHIP "Business Basic" - Synch-Data Only
	Hugoton							Other, Other, FHIP "Business Enhanced"

KS	Hugoton	199.99	0.0	199.99	50.0	50.0	0.0	Other, Other, FTTP "Business Enhanced" - Synchronous
	Hugoton							Other, Other, FTTP "Business Enhanced" -

KS	Registon	209.99	0.0	209.99	50.0	50.0	0.0	Other, Other, FIF - Business Enhanced - Synch-Data Only

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[illegible]

(800) Operating Companies	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net
<810>	Reporting Carrier	Pioneer Telephone Association, Inc.
<811>	Holding Company	Pioneer Telephone Association, Inc.
<812>	Operating Company	Pioneer Telephone Association, Inc.

[illegible]

PIONEER TELEPHONE ASSOCIATION, INC.

QUALITY OF SERVICE AND CUSTOMER PROTECTION PROCESS

(USAC DOCUMENT - 411817KS510.PDF)

The Pioneer Telephone Association, Inc.
d/b/a
Pioneer Communications

QUALITY OF SERVICE & CUSTOMER PROTECTION PROCESSES
(For telephone, cable television and Internet service.)

1. **Available Customer Service Representatives to Assist Customers** – All calls received by Pioneer Communications during business hours, 8:00am to 5:00pm, are answered by a phone receptionist and transferred to an available customer service representative. Customer service representatives assist customers during this time. When the assigned customer service representatives are unable to answer calls, additional customer service help desk representatives are available to help answer phones.
2. **Provide a 24/7 Hour Customer Service Help Desk** – All calls are answered. Customer service help desk representatives assist customers from 12:00am to 11:59pm each day. Issues, such as outages, requiring immediate attention are sent to the Pioneer Communications service technician on call, who works to resolve the matter as quickly as possible. If that technician is unable to resolve the problem, additional technicians are called. Unresolved issues are reviewed the following work day. Call logs are reviewed daily by personnel.
3. **Online Bill Payments** – Payments made online are posted to the customer's account promptly and are viewable on the customer's account within 24 hours. Any problems are reported to the senior manager, and resolved as quickly as possible.
4. **Customer Satisfaction Surveys to All Current Subscribers** – Surveys with questions regarding the areas of services and Pioneer Communications personnel are made available to customers to rate the company. These surveys are distributed by phone calls and paper. Results are returned to the senior management team for interpretation and to allow proper follow-up to customer issues.
5. **Give Customers Cut-off Warnings & Provide Bill Arrangement Opportunities** – Customers receive their monthly bill on or before the 1st of each month. The bill is due on the 15th of the month. If the bill goes unpaid, a late notice is sent on the 16th with a second due date of eleven days after the 15th (due on the 26th) and are instructed to pay by that date to avoid suspension. We will suspend a customer for non-payment on the 4th of the following month. If the 4th falls on a Friday or holiday, the suspension occurs

the next business day. (Customers in danger of being suspended also receive a phone call from the customer service representatives before the 4th.) Customers with extenuating circumstances are allowed to arrange bill payment plans over a period of time to avoid being suspended.

6. **Ensure That All New Service Installation Orders Are Fulfilled Promptly** – At the time of order placement, a customer is given information about when the installation will occur, depending on the current installation schedule. If network is already in place, the installation is completed customers' earliest convenience; if network is in not in place, the installation is completed once the network has been built.
7. **Minimize Customer Downtime for Services** – All trouble reports are handled the same day the report is received, including after normal working hours and on the weekend.
8. **Proactively Monitoring in Case of Major Service Outages** – Service technicians will be made aware of outages affecting customers within thirty minutes. It is the goal of Pioneer Communications to resolve major outages in four hours or less. If an outage has not been resolved within four hours, technicians will begin utilizing all resources, both from within and from outside.

CUSTOMER PRIVACY

Company Confidential Information Policy – Pioneer Communications has a company policy in place that holds employees accountable for a breach of confidentiality concerning customer data and company information. Employees are reminded that revealing any type of confidential information to unauthorized persons or tampering with or altering company records and/or property is a violation of trust that can result in disciplinary action up to and including discharge.

Company CPNI Policy – Pioneer Communications also has a Customer Proprietary Network Information (CPNI) policy in place that ensures employee compliance with the FCC's CPNI guidelines. Outlined within the policy is a detailed description of CPNI as well as both acceptable and unacceptable CPNI practices. Employees are required to sign waivers stating they understand and agree to comply with the policy and acknowledge that failure to protect this information result in disciplinary action up to and including discharge. As a part of this policy, Pioneer Communications has designated a Compliance Officer responsible for training employees, monitoring CPNI related activities, and reporting breaches.

PIONEER TELEPHONE ASSOCIATION, INC.

EMERGENCY SITUATION FUNCTIONALITY – AVAILABILITY OF BACK UP POWER

(USAC DOCUMENT - 411817KS610.PDF)

PIONEER TELEPHONE ASSOCIATION, INC EMERGENCY SITUATION FUNCTIONALITY

AVAILABILITY OF BACK-UP POWER

Pioneer Telephone Association, Inc. owns and operates fifteen central office locations within the boundaries of its serving area. Each central office contains a diesel, natural gas or propane generation system and an automatic transfer switch. These systems are capable of providing sufficient back-up power for rectifiers, lighting and HVAC for lengthy outages of commercial power. Each generation system is inspected and manually exercised monthly by Pioneer personnel. Pioneer also services the generators annually and makes minor system repairs. Major system repairs are completed by manufacturer-certified technicians.

Remote subscriber terminals contain back-up battery systems to maintain service during commercial power outages. The batteries and power systems are periodically maintained and tested by qualified technicians. During extended commercial power outages, portable AC generators are available for use at sensitive or high-traffic terminals.

For fiber-to-the-home (FTTH) services, Optical Network Terminations at the customer premises are paired with battery back-up systems that are designed to sustain landline service during commercial power outages. For extended power outages, batteries are available for delivery to critical locations. System and battery statuses are monitored by the manufacturer's network monitoring software.

TRAFFIC ROUTING

Traditional TDM voice traffic between Pioneer's host central office switch and remote central office switches is delivered across an OC-48 SONET ring. This network utilizes two-fiber Bidirectional Line Switched Ring (BLSR) technology to allow continued connectivity in the event of a transport failure.

H.248 and MGCP voice traffic is delivered by Pioneer's 10Gb packet-switch network, using ERPS for <50ms ring switches for service protection, as well as redundant LAG connections at the component level in each central office.

Voice traffic between Pioneer's host central office switch and upstream tandem switch is also transported across the Pioneer SONET ring. At the handoff point, two redundant OC-12 connections are connected between Pioneer's transport node and the upstream carriers. SS7 A-links are diverse path routed over separate carriers for reliability.

NETWORK CAPACITY

Voice trunks and switching components are periodically monitored by Pioneer to ensure channel availability. Upstream carriers connected to Pioneer's network also perform their own utilization testing. The upstream carriers will increase or reduce channel capacity as necessary.

PIONEER TELEPHONE ASSOCIATION, INC.

VOICE SERVICES RATE COMPARABILITY

(USAC DOCUMENT - 411817KS1010.PDF)

Voice Services Rate Comparability
The Pioneer Telephone Association, Inc.
d/b/a Pioneer Communications

In compliance with the 54.313 Rules, The Pioneer Telephone Association, Inc. must certify that its current rate for fixed voice services is no more than two standard deviations above the national average urban rate for voice service.

According to the 2017 Urban Rate Survey¹ conducted by the FCC's Wireline Competition Bureau, the 2016 rate floor for voice services is \$22.49 and the reasonable comparability benchmark for voice services is \$49.51.

The rates shown on the Voice Pricing Form (0700) are below \$41.07. Consequently, The Pioneer Telephone Association, Inc. meets the above mentioned requirement.

¹ *WIRELINE COMPETITION BUREAU ANNOUNCES RESULTS OF 2017 URBAN RATE SURVEY FOR FIXED VOICE AND BROADBAND SERVICES, POSTING OF SURVEY DATA AND EXPLANATORY NOTES, AND REQUIRED MINIMUM USAGE ALLOWANCE FOR ETCs SUBJECT TO BROADBAND PUBLIC INTEREST OBLIGATIONS. WC Docket #10-90, DA 17-167 Public Notice - Released February 14th, 2017.*

PIONEER TELEPHONE ASSOCIATION, INC.

BROADBAND RATE COMPARABILITY

(USAC DOCUMENT – 411817KS1030)

BROADBAND RATE COMPARABILITY

Pioneer Telephone Association, Inc.

d/b/a Pioneer Communications

BROADBAND BENCHMARK

According to the 2017 Broadband Reasonable Comparability Benchmark conducted by the FCC Wireline Competition Bureau (*and using the Reasonable Comparability Benchmark Calculator supplied by the FCC*), the reasonable comparability benchmark for Broadband rates are as follows¹:

Download Speed	Upload Speed	Usage Allowance	Benchmark
6 Mbps	1 Mbps	Unlimited	\$71.27
15 Mbps	3 Mbps	Unlimited	\$83.82
25 Mbps	5 Mbps	Unlimited	\$90.77

RATE REQUIREMENT

Per 47 C.F.R. § 54.313(a)(12), Pioneer Telephone Association, Inc. d/b/a Pioneer Communications' pricing can be no more than the applicable benchmark as published annually by the Wireline Competition Bureau. The rates shown on Pioneer Telephone Association, Inc. d/b/a Pioneer Communications' Broadband Price Offerings Form (0710) are all below the FCC's 2016 Broadband Pricing Benchmarks. Consequently, Pioneer Telephone Association, Inc. d/b/a Pioneer Communications meets the above mentioned requirement.

The Survey also noted that the required minimum usage allowance is 150GBs for rate-of-return carriers, such as Pioneer Telephone Association, Inc. d/b/a Pioneer Communications. Pioneer Telephone Association, Inc. d/b/a Pioneer Communications does not currently implement a usage allowance maximum. All broadband customers have unlimited usage allowance.

¹ <http://www.fcc.gov/encyclopedia/urban-rate-survey-data>

PIONEER TELEPHONE ASSOCIATION, INC.

MILESTONE CERTIFICATION

(USAC DOCUMENT - 411817KS3010.PDF)

Title 47 §54.313(a) (1) Progress Report

Due: July 1st, 2017

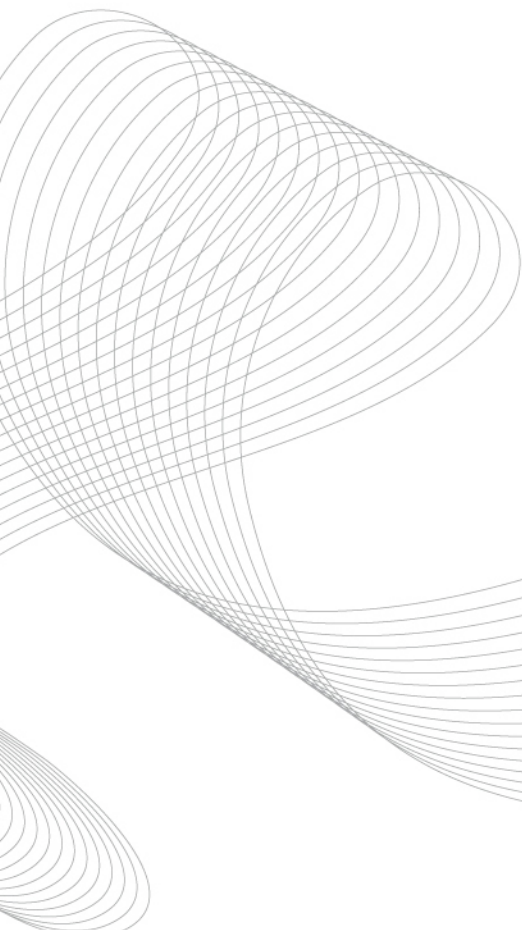
Line 3010(b) - Milestone Certification

Pioneer Telephone Association, Inc. d/b/a Pioneer Communications certifies that, upon a reasonable request, it will provide Broadband services at actual speeds of 4Mbps downstream / 1Mbps upstream, with latency suitable for real-time applications, including VoIP and usage capacity that is reasonably comparable to urban areas and that requests for such services are met within a reasonable amount of time.

PIONEER TELEPHONE ASSOCIATION, INC.

FINANCIAL STATEMENTS

(USAC DOCUMENT - 411817KS3026.PDF)



Report of Independent Auditors and
Consolidated Financial Statements
with Supplementary Information for

**The Pioneer Telephone
Association, Inc.**

December 31, 2016 and 2015

MOSS-ADAMS_{LLP}

Certified Public Accountants | Business Consultants

REDACTED - FOR PUBLIC INSPECTION

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REPORT OF INDEPENDENT AUDITORS

Board of Directors
The Pioneer Telephone Association, Inc.

Report on Financial Statements

We have audited the accompanying consolidated financial statements of The Pioneer Telephone Association, Inc. and its subsidiaries, which comprise the consolidated balance sheets as of December 31, 2016 and 2015, and the related consolidated statements of operations, comprehensive income (loss), members' equity, and cash flows for the years then ended, and the related notes to the consolidated financial statements.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these consolidated financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these consolidated financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audits to obtain reasonable assurance about whether the consolidated financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the consolidated financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the consolidated financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the consolidated financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the consolidated financial statements.

REPORT OF INDEPENDENT AUDITORS
(continued)

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the consolidated financial statements referred to above present fairly, in all material respects, the financial position of The Pioneer Telephone Association, Inc. and its subsidiaries as of December 31, 2016 and 2015, and the results of their operations and their cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Moss Adams LLP

Spokane, Washington
May 8, 2017

PIONEER TELEPHONE ASSOCIATION, INC.
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

Part A. Balance Sheet

	Balance Prior Year	Balance End of Period
Assets		
Current Assets		
1. Cash and equivalents		
2. Cash - RUS construction fund		
3. Affiliates		
a. Telecom accounts receivable		
b. Other accounts receivable		
c. Notes receivable		
4. Nonaffiliates		
a. Telecom accounts receivable		
b. Other accounts receivable		
c. Notes receivable		
5. Interest and dividends receivable		
6. Materials - regulated		
7. Materials - nonregulated		
8. Prepayments		
9. Other current assets		
10. Total current assets (1 thru 9)		
Noncurrent assets		
11. Investment in affiliated companies		
a. Rural development		
b. Nonrural development		
12. Other investments		
a. Rural development		
b. Nonrural development		
13. Nonregulated investments		
14. Other noncurrent assets		
15. Deferred charges		
16. Jurisdictional differences		
17. Total noncurrent assets (11 thru 16)		
Property, Plant, and Equipment		
18. Telecom plant in service		
19. Property held for future use		
20. Plant under construction		
21. Plant adj, nonop, and goodwill		
22. Less accumulated depreciation		
23. Net plant (18 thru 21 less 22)		
24. Total assets (10+17+23)		

PIONEER TELEPHONE ASSOCIATION, INC.
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

	Balance Prior Year	Balance End of Period
Liabilities and Stockholders' Equity		
Current Liabilities		
25. Accounts payable		
26. Notes payable		
27. Advance billing and payments		
28. Customer deposits		
29. Current maturities l/t debt		
30. Current maturities l/t debt - rur dev		
31. Current maturities - capital lease		
32. Income taxes accrued		
33. Other taxes accrued		
34. Other current liabilities		
35. Total current liabilities (25 thru 34)		
Long-term debt		
36. Funded debt - RUS notes		
37. Funded debt - RTB notes		
38. Funded debt - FFB notes		
39. Funded debt - Other		
40. Funded debt - rural deb		
41. Premium (discount) on l/t debt		
42. Reacquired debt		
43. Obligations under capital lease		
44. Adv from affiliated companies		
45. Other long-term debt		
46. Total long-term debt		
Other liabilities and deferred credits		
47. Other long-term liabilities		
48. Other deferred credits		
49. Other jurisdictional differences		
50. Total other liabilities and deferred credits (47 thru 49)		
Equity		
51. Capital stock		
52. Additional paid in capital		
53. Treasury stock		
54. Memberships and cap certificates		
55. Other capital		
56. Patronage capital credits		
57. Retained earnings or margins		
58. Total equity (51 thru 57)		
59. Total liabilities and equity (35+46+50+58)		

PIONEER TELEPHONE ASSOCIATION, INC.
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

Part B. Statements of Income and Retained Earnings or Margins

	Prior Year	This Year
1. Local network services revenues		
2. Network access revenues		
3. Long distance network services revenues		
4. Carrier billing and collection revenues		
5. Miscellaneous revenues		
6. Uncollectible revenues		
7. Net operating revenues (1 thru 5 less 6)		
8. Plant specific operations expense		
9. Plant nonspecific operations expense		
10. Depreciation expense		
11. Amortization expense		
12. Customer operations expense		
13. Corporate operations expense		
14. Total operating expenses (8 thru 13)		
15. Operating income or margins (7 less 14)		
16. Other operating income and expenses		
17. State and local taxes		
18. Federal income taxes		
19. Other taxes		
20. Total operating taxes (17+18+19)		
21. Net operating income or margins (15+16-20)		
22. Interest on funded debt		
23. Interest expense capital leases		
24. Other interest expense		
25. Allowance for funds used during construction		
26. Total fixed charges (22+23+24-25)		
27. Nonoperating net income		
28. Extraordinary items		
29. Jurisdictional differences		
30. Nonregulated net income		
31. Total net income or margins		
32. Total taxes based on income		
33. Retained earnings or margins beginning of year		
34. Miscellaneous credits year-to-date		
35. Dividends declared (common)		
36. Dividends declared (preferred)		
37. Other debits year-to-date		
38. Transfers to patronage capital		
39. Retained earnings or margins end of period		
40. Patronage capital beginning of year		
41. Transfers to patronage capital		
42. Patronage capital credits retired		
43. Patronage capital end of year		

PIONEER TELEPHONE ASSOCIATION, INC.

OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

Part C. Statements of Cash Flows

	Prior Year	This Year
1. Beginning cash (cash and equivalents plus RUS construction fund)		
CASH FLOWS FROM OPERATING ACTIVITIES		
2. Net income (loss)		
Adjustments to reconcile net income to net cash from operating activities		
3. Add: depreciation		
4. Add: amortization		
5. Other (explain)		
Changes in operating assets and liabilities		
6. Decrease (increase) in accounts receivable		
7. Decrease (increase) in materials and inventory		
8. Decrease (increase) in prepayments and deferred charges		
9. Decrease (increase) in other current assets		
10. Increase (decrease) in accounts payable		
11. Increase (decrease) in advance billings and payments		
12. Increase (decrease) in other current liabilities		
13. Net cash from by operations		
CASH FLOWS FROM FINANCING ACTIVITIES		
14. Decrease (increase) in notes receivable		
15. Increase (decrease) in notes payable		
16. Increase (decrease) in customer deposits		
17. Net Increase (decrease) in long-term debt (including current maturities)		
18. Increase (decrease) in other liabilities and deferred credits		
19. Increase (decrease) in capital stock, paid-in capital, membership and capital certificates and other capital		
20. Less: payment of dividends		
21. Less: patronage capital credits retired		
22. Other (explain)		
23. Net cash from by financing activities		
CASH FLOWS FROM INVESTING ACTIVITIES		
24. Net capital expenditures (property, plant, and equipment)		
25. Other long-term investments		
26. Other noncurrent assets and jurisdictional differences		
27. Other (explain)		
28. Net cash from investing activities		
29. Net increase (decrease) in cash		
30. Ending cash		